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Attorneys for Debtors

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

In re:

IGNACIO GUTIERREZ JR. CONCEPCION GUTIERREZ

Debtors.

Case No. 15-27922

Chapter 13

Judge JOEL T. MARKER

Filed Electronically

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Ignacio Gutierrez Jr. and Concepcion Gutierrez, ("Debtors"), by and through counsel, hereby object to the Trustee's Motion to Dismiss for failure to produce at the 341 Meeting evidence of current income (Docket No. 15):

- 1. Debtors filed for Chapter 13 bankruptcy on August 24, 2015.
- 2. On October 14, 2015 the Trustee filed a Motion to Dismiss for failure to produce at the 341 Meeting evidence of

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current income (Docket No. 15).

3. Debtors have since provided that documentation to the Trustee.

THEREFORE, Debtors respectfully request that the Court deny the Trustee's Motion to Dismiss.

Dated this 23rd day of October, 2015.

Beehive Advocates

/s/
Brian Wurtz
Attorney for Debtor